April 5, 1988

John G. Whitehead United Technologies Pratt & Whitney 400 Main Street East Hartford, CT 06108 RCRA RECORDS CENTER
FACILITY Prot & Whitney Man St
1.D. NO.CID990672081
FILE LOC. R-113
OTHER RDMS #2899

RE: Burn-Zol Hazardous Waste Incinerator Closure Plan United Technologies Pratt & Whitney Fast Hartford, CT: CTD 990672081

Dear Mr. Whitehead:

This letter is in response to your March 14, 1988 letter to Mr. Authur Wing, of this office, requesting a 60 day extension for the resubmittal of the above referenced closure plan. As I have recently been assigned responsibility for the review of your facility, I would like to outline some of EPA's concerns over the consideration of an extension.

Both EPA and the Connecticut DEP have invested a considerable amount of time reviewing the closure plans for the Burn-Zol hazardous waste incinerator at your facility in East Hartford. This includes the original plan submitted on January 6, 1986 as well as two resubmittals on July 14, 1986 and January 16, 1987, which were based on our review and comments. While I can appreciate your desire to now take time and investigate alternatives for cost effectiveness, timeliness, and ways to increase the potential for immediate approval, this type of activity is expected to be completed before the initial submittal of a closure plan.

Your letter does state, however, that the alternatives you are investigating will address EPA's and the CT DEP's comments to the most recent closure plan submittal. While this is necessary, it is also imperative that the next submitted plan be very complete and incorporate all recommedations that have been submitted to you for all closure plans thus far.

While EPA is granting you this extension, we do reserve our authority in accordance with §3008 of the Resource Conservation & Recovery Act to take enforcement actions for future noncompliance with timeframes as specified in 40 CFR 265.112(d)(4). A 60 day extension will be May 15, 1988.

Sincerely,

Ronald C. Jennings Environmental Engineer Waste Management Division

cc: George Dews, CT DEP

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